

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MINNESOTA**

In re: CHANGE HEALTHCARE, INC.  
CUSTOMER DATA SECURITY  
BREACH LITIGATION

This Document Relates to:  
ALL ACTIONS

MDL No. 24-3108 (DWF/DJF)

**PROVIDER PLAINTIFFS' MOTION  
FOR COURT SUPERVISION OF  
COMMUNICATIONS BETWEEN  
DEFENDANTS AND THE PUTATIVE  
CLASS**

Total Care Dental and Orthodontics, et al.,

Plaintiffs,

v.

UnitedHealth Group Incorporated,  
UnitedHealthCare Services, Inc., Optum  
Insight, Change Healthcare Inc., Change  
Healthcare Operations, LLC, Change  
Healthcare Solutions, LLC, Change  
Healthcare Holdings, Inc., Change  
Healthcare Technologies, LLC, and  
Change Healthcare Pharmacy Solutions,  
Inc., Optum, Inc., Optum Financial, Inc.,  
Optum Bank, and Optum Pay,

Defendants.

Case No. 0:25-cv-00179-DWF-DJF

Provider Plaintiffs hereby move for an order (1) seeking court supervision of Defendants' communications with putative Provider Class Members, (2) requiring Defendants to provide a curative disclosure relating to prior communications with putative Provider Class Members and (3) requiring Defendants to disclose information regarding their communications with the putative Provider Class to the Court and Court-appointed Lead Counsel.

Said motion is based on the pleadings, files, records, and proceedings herein, as well as the memorandum of law and declarations filed in support of this motion.

Dated: April 2, 2025

s/Daniel E. Gustafson

Daniel E. Gustafson (#202241)  
**GUSTAFSON GLUEK PLLC**  
Canadian Pacific Plaza  
120 South Sixth Street, Suite 2600  
Minneapolis, MN 55402  
Telephone: (612) 333-8844  
dgustafson@gustafsongluek.com

*Plaintiffs' Overall Lead Counsel*

Shawn M. Raiter  
**LARSON-KING LLP**  
30 East Seventh Street, Suite 2800  
St. Paul, MN 55101  
Telephone: (651) 312-6500  
sraiter@larsonking.com

*MDL Liaison Counsel*

E. Michelle Drake (#387366)  
**BERGER MONTAGUE**  
1229 Tyler Street NE, Suite 205  
Minneapolis, MN 55413  
Telephone: (612) 594-5933  
emdrake@bm.net

Norman E. Siegel  
**STUEVE SIEGEL HANSON LLP**  
460 Nichols Road, Suite 200  
Kansas City, Missouri 64112  
Telephone: (816) 714-7100  
siegel@stuevesiegel.com

Warren Burns  
**BURNS CHAREST LLP**  
900 Jackson Street, Suite 500  
Dallas, TX 75202  
Telephone: (469) 458-9890  
wburns@burnscharest.com

*Provider Track Co-Lead Counsel*